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November 20, 2025
European Commission
Directorate-General for Justice and Consumers (DG JUST)
1049 Brussels, Belgium
Cc: Directorate-General for Education, Youth, Sport and Culture (DG EAC)
Rue Joseph II 70, 1000 Brussels, Belgium

Re: ***Update to Case No. 86019 – Administrative Obstruction and Discriminatory Governance in Hungarian Higher Education (Semmelweis University)***

Dear Commission,

I write to update **Case No. 86019** with a consolidated evidentiary record demonstrating that the denial of compulsory educational access and the administrative obstruction I faced at ***Semmelweis University (Sept 2024–Nov 2025)*** are not isolated irregularities but elements of a structural governance pattern in Hungary that infringes the ***EU Charter (Arts. 14, 21, 41, 47)***, conflicts with ***ESG/WFME*** quality-assurance norms, and mirrors deficiencies previously noted in the ***Commission's Rule-of-Law reporting***. The expanded record is publicly archived and independently verifiable through my **ORCID profile (0009-0005-4228-1124),** which links to distributed SSRN papers in this series, including **Administrative Obstruction in EU Medical Education VI (SSRN ID 5755943),** ***Gatekeeper of Rights II (ID 5628170), Administrative Obstruction in the European Union Medical Education: III (ID 5418874), Administrative Obstruction IV – Unwritten Rules (ID 5418897), Denied Access to the Scalpel (ID 5375910),***

Specimen Deficiency (ID 5399018), Educational Rights and Whistleblower Protection (ID 5384860), Gatekeeper of Rights I (ID 5380414), and Cross-Border Acknowledgment papers (IDs 5454954, 5380402, 5693002). These publications reconstruct the case from primary documents and establish a continuous pattern in which lawful disclosures and petitions were met not with timely, reasoned decisions, but with silence, defective service, and diversion.

The chronology is unequivocal. Four ***internal appeals filed between June 26 and July 3, 2025,*** received no substantive response. An administrative court submission was made on **July 3 (Budapest Metropolitan Court, 7. Kpk. 750.239/2025/2).** Only after the Court's transmission order dated **July 11 did the University issue its initial response on July 14. The Ombudsman (AJBH**) initiated **Case EBF–AJBH–309–2025** in late June; however, the service mishandled the case concerning an ***August 15 deficiency ruling***, which was returned marked **"NOT CLAIMED"** on **September 4, 2025**, despite providing accurate contact information. Subsequently, a termination warning was issued on **September 30, 2025**, due to invalid service, and re-service was only implemented on **October 2, 2025, and October 9, 2025**. On **October 20, 2025,** the authority further limited communication channels to postal and electronic means, despite its own service failures, thereby creating an obstacle for a foreign European Union citizen. Following my registered rectification on October 27, 2025, I did not receive an acknowledgment. Collectively, these facts demonstrate administrative negligence pursuant to **Act CL/2016 (§50(5)),** contravene Section 88 of the Administrative Procedure Act regarding lawful service, and undermine the guarantees of good administration and effective remedy enshrined in the Charter.

The sequence also includes a dean-signed takedown demand on **October 13, 2025**—three days after **NAIH acknowledged GDPR Case J-427-3/2025** and

immediately following AJBH's procedural reactivation—targeting lawfully published research papers and thereby engaging **Act XXV/2023 and Directive (EU) 2019/1937** on whistleblower protection. In parallel, the **Hungarian Accreditation Committee (MAB)** docketed my dossier under **Reg. nr. MAB/477-4/2025** for the WFME accreditation cycle, which elevates the matter from a campus dispute to a ***quality-assurance and recognition risk (ESG 1.1, 1.3, 1.4, 1.6, 1.7; WFME 3.1, 3.4).*** The cumulative record shows a repeating cadence—silence, a compelled response, then silence again—undermining domestic remedy to such a degree that Article 47's right to an effective remedy is, in practice, nullified.

Considering this consolidated, third-party-archived evidence, I respectfully ask the Commission to reassess **Case 86019** as a systemic breach of EU law and to initiate scrutiny under DG JUST and DG EAC. I further ask that this dossier be considered for inclusion in the upcoming **Rule-of-Law Report on Hungary**, given its implications for EU-funded higher-education governance, cross-border recognition of qualifications, and the accessibility of remedies for EU citizens studying abroad. To reduce cost and ensure integrity, I am not enclosing paper annexes; the Commission may consult the ORCID record and associated DOIs directly, and I can furnish a one-page QR-coded evidence index on request.

Consolidated evidentiary record for **Case No. 86019**, documenting administrative obstruction, discriminatory governance, and procedural irregularities at Semmelweis University between September 2024 and November 2025.

To ensure full transparency and independent verifiability, all evidence cited below is permanently archived under my ORCID profile: https://orcid.org/0009-0005-4228-1124

This ORCID page contains the full set of distributed research outputs—including the SSRN papers, appendices, legal timelines, court filings, and cross-border acknowledgment documents—that reconstruct the sequence of events using primary documents.

Because I understand that links may not always open within institutional firewalls, I have included summaries of each paper so the Commission can understand their relevance even without accessing them externally.

ORCID Master Archive:
https://orcid.org/0009-0005-4228-1124

SUMMARY OF PUBLISHED WORKS (DIRECTLY RELEVANT TO CASE 86019)

1. **Administrative Obstruction in European Union Medical Education VI: Systematic Discrimination and Administrative Failures in the EU Medical Program – A Legal Case Study from Semmelweis University VI**

DOI: 10.2139/ssrn.5755943

A comprehensive analysis linking FM/CV discrimination, denial of anatomy access, degraded exam materials, and Ombudsman/NAIH correspondence to ESG/WFME violations.

2. **Gatekeeper of Rights II: Ongoing Investigation and Closure of a Whistleblower Case in Hungarian Higher Education Without Justification**

DOI: 10.2139/ssrn.5628170

Documents procedural misconduct by the Ombudsman, including failure of service (“NOT CLAIMED”), premature closure, and non-acceptance of digital communication channels.

3. **Administrative Obstruction in EU Education: Institutional Hypocrisy and Rule-of-Law Deficiency at Semmelweis University (Part III)**

DOI: 10.2139/ssrn.5418874

Contrasts Semmelweis University’s public statements with its internal practices, demonstrating alignment with Hungary’s systemic rule-of-law deficiencies.

4. **Administrative Obstruction in European Union Medical Education — Fourth Series: Unwritten Rules, Misled Students, Misinformation in Higher Education (Part IV)**

DOI: 10.2139/ssrn.5418897

Shows how unwritten, unofficial requirements—never present in SZMSZ/HKR rules—were used to block access and mislead international students.

5. **Denied Access to the Scalpel for Dissecting the Specimen: A Legal Case Study of Academic Obstruction at Semmelweis University**

DOI: 10.2139/ssrn.5375910

Legal case reconstruction proving unjustified denial of

dissection lab access despite valid FM/CV registration and tuition payment.

6. **Specimen Deficiency as an Educational Obstacle: A Legal Case Study in Hungarian Medical Education**

DOI: 10.2139/ssrn.5399018

Photographic and legal evidence show that cadaver specimens used in high-stakes examinations lacked required anatomical structures, violating ESG 1.3 and WFME guidelines.

7. **Educational Rights and Whistleblower Protection in Hungarian Medical Education: Evidence from a Central European Administrative Court Case**

DOI: 10.2139/ssrn.5384860

Maps university retaliation and administrative silence within the framework of the Whistleblower Protection Act (XXV/2023) and EU Directive 2019/1937.

8. **Gatekeeper of Rights I: The Role of the Hungarian Ombudsman in Educational Oversight**

DOI: 10.2139/ssrn.5380414

Analyzes the legal duties of the Ombudsman and how those duties failed in practice in Case EBF–AJBH–309–2025.

9. **Cross-Border Acknowledgment of Academic Obstruction: A Case Study in Whistleblower**

Documentation and International Accreditation Monitoring

DOI: 10.2139/ssrn.5380402

Details acknowledgment by WFME, FAIMER, ECFMG, and the Irish Government; includes MAB accreditation confirmation (Reg. nr. MAB/477-4/2025).

10. **Cross-Border Acknowledgment of Academic Obstruction: A Systemic QA Dossier on Access Denial, Policy Inconsistency, and Accreditation Risk**

DOI: 10.2139/ssrn.5454954

Compiles systemic quality-assurance issues for foreign students across multiple Hungarian institutions.

11. **Oral Exams Without Standards: A Case Study of Assessment Bias Against International Medical Students in Central Europe**

DOI: 10.5281/zenodo.16934383

Document inconsistencies in the oral exam framework that disproportionately affect non-Hungarian medical students.

12. **Over-Enrolled and Under-Served: Quantitative Evidence of Administrative Obstruction in EU Medical Education**

DOI: 10.5281/zenodo.16934054

Uses enrollment-capacity discrepancies and

infrastructure shortages to demonstrate ESG non-compliance.

13. ***Administrative Obstruction of EU Education: A Legal Case Study (First paper in series)***

DOI: 10.2139/ssrn.5362705

Introduces the foundational legal contradictions in Semmelweis's FM/CV classification system.

14. **Seventy Professors, Zero Rebuttals: Institutional Silence and Accountability in Higher Education**

DOI: 10.2139/ssrn.5420914

Investigates omission and failure to respond as systemic governance features rather than isolated errors.

Procedural Update for Case 86019

The unified record now shows:
Four unanswered internal appeals (June 26–July 3, 2025).
Administrative Court Case 7.Kpk . 750.239/2025/2 triggered the University's first response.
Ombudsman Case EBF–AJBH–309–2025 suffered defective service, termination without valid notice, and refusal to accept email.
NAIH Case J-427-3/2025 initiated a GDPR investigation; shortly afterwards, the University issued a takedown notice, suggesting retaliation.
MAB logged the case into its WFME cycle (Reg. nr. MAB/477-4/2025) and acknowledged receipt of all quality-assurance materials.
Evidence of degraded exam materials, inconsistent FM/CV rules, and discriminatory access was documented in multiple papers above.

- ECFMG (USA)
- Irish DFHERIS
- Hungarian Accreditation Committee (MAB — Reg. nr. MAB/477-4/2025)

Why am I submitting this updated dossier

The unified record now demonstrates clearly that:
Multiple internal appeals (June 26–July 3, 2025) received no substantive response.
Ombudsman service failed due to procedural service errors, not merits.
Administrative Court Case 7.Kpk . 750.239/2025/2 triggered the university's first formal response.
The university's actions—including a takedown demand dated October 13, following NAIH Case J-427-3/2025—appear retaliatory in nature under Act XXV/2023.
The Hungarian Accreditation Committee has formally logged the case for the WFME accreditation cycle.
ESG/WFME standards (1.1, 1.3, 1.4, 1.6, 1.7; WFME 3.1, 3.4) are implicated through deficient resources, inconsistent rules, and discriminatory barriers.

Request to the Commission

Considering the above, and given that all evidence is now permanently and independently archived:
I respectfully request that the European Commission reopen and reassess Case No. 86019 as a systemic breach of EU law, particularly of:
EU Charter Articles 14, 21, 41, and 47
Directive 2019/1937 (Whistleblower Protection)
Directive 2005/36/EC (Professional Qualifications)
ESG Quality-Assurance Standards
I further request that this material be considered within ongoing Rule-of-Law monitoring, as the patterns documented mirror structural issues already identified in Commission reporting.

To minimize costs and ensure verifiability, I have not attached annexes; instead, I have provided full ORCID access and DOIs for every referenced paper. If needed, I am ready to send you a one-page QR-indexed evidence sheet.

Thank you for your attention and your commitment to ensuring fairness and compliance with the rule of law within EU higher education structures.
Respectfully,
Siddhartha Harsh Wardhan
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Email: swardhan1@icloud.com

Respectfully,
Siddhartha Harsh Wardhan

On Jul 8, 2025, at 5:07 PM, EAC UNITE R1 <eac-unite-r1@ec.europa.eu> wrote: